

	A	B	C	D	E	F	G
2	SC	PON	VER	TIMESTAMP	TYPE	ERR#	NOTE OR ERROR DESCRIPTION
71	1986	GA438822	0	7/11/01 13:30	B050		FOC, POS OR JEP WAS APPLIED TO LSR NO RETFD
72	1986	GA438822	0	7/11/01 15:18	B025		POS ISSUED, SOCS STATUS - PD PENDING ORDER
73	1986	GA438822	0	7/11/01 15:19	TAGR		PON POSTED AS ACKNOWLEDGED
74	1986	GA438822	0	7/16/01 16:39	B050		865 COMPLETION STAGED FOR LSR, LEO STATUS CHANGED TO "P"
75	1986	GA438822	0	7/16/01 16:39	B025		865 ISSUED RETURN-FEED # 0003 COMPLETION SENT
76	1986	GA438822	0	7/16/01 16:40	TAGR		PON POSTED AS ACKNOWLEDGED
77	1986	GA438893	0	7/11/01 14:13	BB18		LSR LOADED AS MECHANIZED
78	1986	GA438893	0	7/11/01 14:14	C040		LSR HAS BEEN SENT TO LESOG
79	1986	GA438893	0	7/11/01 14:15	ERR	8820	SOCS ERROR: RTN SAE 004 ACT CODE NOT FOR THIS ORD TYPE
80	1986	GA438893	0	7/11/01 14:15	C020		PARTIAL ORDER GENERATED AND CANCELLED
81	1986	GA438893	0	7/11/01 14:15	C020		INFO-ORDER DOG9KV32 CANCELLED
82	1986	GA438893	0	7/11/01 14:15	SGNT		DB09C020 INSERTED TO TSIGNOUT
83	1986	GA438893	0	7/11/01 14:15	C020		LSR IN "ERROR" STATUS PLACED BY LESOG
84	1986	GA438893	0	7/11/01 14:19	CLM		LSR Claimed By CUID - YBCFQRW
85	1986	GA438893	0	7/11/01 14:45	B050		8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
86	1986	GA438893	0	7/11/01 14:45	B025		855 ISSUED RETURN-FEED # 0001 FOC SENT
87	1986	GA438893	0	7/11/01 14:46	B025		POS ISSUED, SOCS STATUS - PD PENDING ORDER
88	1986	GA438893	0	7/11/01 14:46	TAGR		PON POSTED AS ACKNOWLEDGED
89	1986	GA438893	0	7/11/01 14:46	TAGR		PON POSTED AS ACKNOWLEDGED
90	1986	GA440029	0	7/13/01 14:28	BB18		LSR LOADED AS MECHANIZED
91	1986	GA440029	0	7/13/01 14:28	C040		LSR HAS BEEN SENT TO LESOG
92	1986	GA440029	0	7/13/01 14:31	C020		LSO IS INCONSISTANT WITH LOCBAN/ATN WHICH MAY CAUSE SITE ERRORS
93	1986	GA440029	0	7/13/01 14:31	ERR	8820	SOCS ERROR: FORMAT 001 FID OISF INVALID FOR BILL SECTION
94	1986	GA440029	0	7/13/01 14:31	C020		PARTIAL ORDER GENERATED AND CANCELLED
95	1986	GA440029	0	7/13/01 14:31	C020		INFO-ORDER DOCLXW80 CANCELLED
96	1986	GA440029	0	7/13/01 14:31	SGNT		DB09C020 INSERTED TO TSIGNOUT
97	1986	GA440029	0	7/13/01 14:31	C020		LSR IN "ERROR" STATUS PLACED BY LESOG
98	1986	GA440029	0	7/13/01 16:57	CLM		LSR Claimed By CUID - YDFPZHK
99	1986	GA440029	0	7/13/01 17:40	B050		8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
100	1986	GA440029	0	7/13/01 17:40	B025		855 ISSUED RETURN-FEED # 0001 FOC SENT
101	1986	GA440029	0	7/13/01 17:40	B050		PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
102	1986	GA440029	0	7/13/01 17:40	B050		FOC, POS OR JEP WAS APPLIED TO LSR NO RETFD
103	1986	GA440029	0	7/13/01 18:16	B025		RETURN FEED RESENT - RETFD-SEQ = 0001
104	1986	GA440029	0	7/13/01 18:46	B025		RETURN FEED RESENT - RETFD-SEQ = 0001
105	1986	GA440029	0	7/14/01 5:16	B025		RETURN FEED RESENT - RETFD-SEQ = 0001
106	1986	GA440029	0	7/14/01 9:45	B025		RETURN FEED RESENT - RETFD-SEQ = 0001
107	1986	GA440029	0	7/14/01 14:15	B025		RETURN FEED RESENT - RETFD-SEQ = 0001
108	1986	GA440029	0	7/14/01 18:45	B025		RETURN FEED RESENT - RETFD-SEQ = 0001
109	1986	GA440029	0	7/15/01 5:15	B025		RETURN FEED RESENT - RETFD-SEQ = 0001
110	1986	GA440029	0	7/15/01 9:45	B025		RETURN FEED RESENT - RETFD-SEQ = 0001
111	1986	GA440029	0	7/15/01 14:15	B025		RETURN FEED RESENT - RETFD-SEQ = 0001
112	1986	GA440029	0	7/15/01 18:45	B025		RETURN FEED RESENT - RETFD-SEQ = 0001
113	1986	GA440029	0	7/16/01 5:15	B025		RETURN FEED RESENT - RETFD-SEQ = 0001
114	1986	GA440029	0	7/16/01 9:45	B025		RETURN FEED RESENT - RETFD-SEQ = 0001
115	1986	GA440029	0	7/16/01 9:46	TAGR		PON POSTED AS ACKNOWLEDGED
116	1986	GA440029	0	7/16/01 17:19	B050		865 COMPLETION STAGED FOR LSR, LEO STATUS CHANGED TO "P"
117	1986	GA440029	0	7/16/01 17:19	B025		865 ISSUED RETURN-FEED # 0002 COMPLETION SENT
118	1986	GA440029	0	7/16/01 18:15	B025		RETURN FEED RESENT - RETFD-SEQ = 0002
119	1986	GA440029	0	7/16/01 18:45	B025		RETURN FEED RESENT - RETFD-SEQ = 0002
120	1986	GA440029	0	7/17/01 5:15	B025		RETURN FEED RESENT - RETFD-SEQ = 0002
121	1986	GA440029	0	7/17/01 9:45	B025		RETURN FEED RESENT - RETFD-SEQ = 0002
122	1986	GA440029	0	7/17/01 9:46	TAGR		PON POSTED AS ACKNOWLEDGED
123	1986	GA440029	0	7/17/01 17:45	MISX		ISSD ORD CREX4 MISSING FLA-VB
124	1986	GA440029	0	7/24/01 11:16	MISC		CNFRMD WI AMBER CREX4 ON ACCT - CR JAX

## **ATTACHMENT 6**

**REDACTED**

## **ATTACHMENT 7**

**REDACTED**

## **ATTACHMENT 8**

**REDACTED**

## **ATTACHMENT 9**

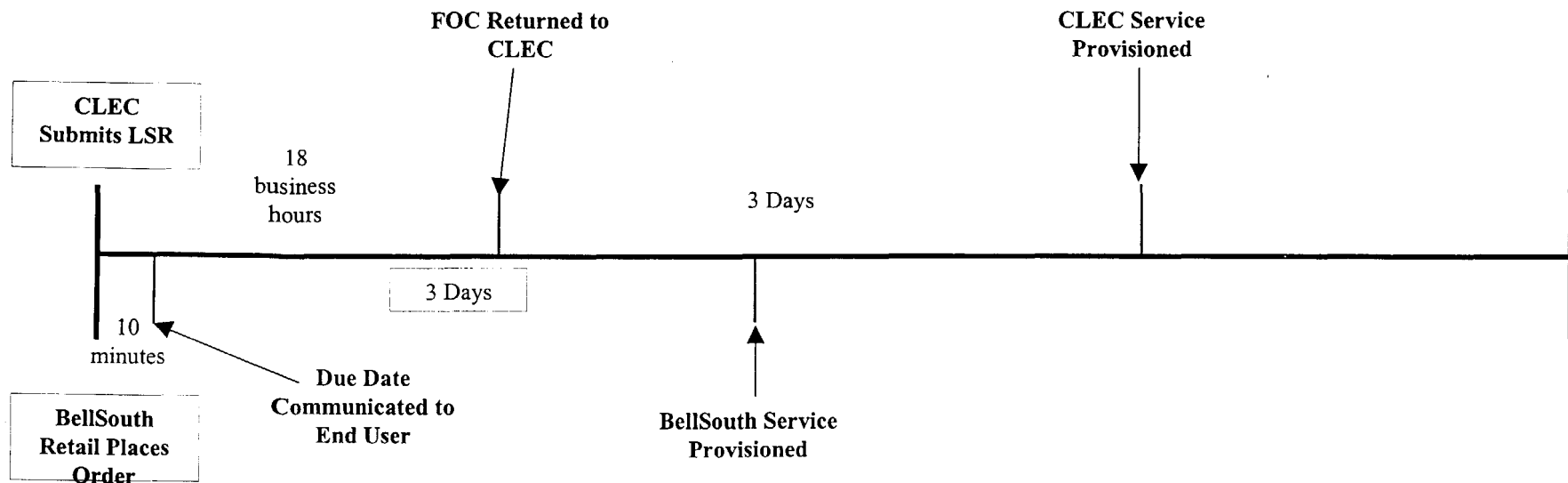


**REDACTED**

# **ATTACHMENT 10**

## Average Completion Interval Example

Example of One New Line Install Order Placed by a CLEC and by BellSouth at the Same Time



- **Georgia CLEC Standard Results:** FOC provided to CLEC within benchmark time and OCI of 3 Days.
- **BellSouth Retail Result (for parity comparison):** OCI of 3 Days (within parity).
- **FCC CLEC Standard Result:** OCI of 5 Days (out of parity compliance).

## DECLARATION OF MEL WAGNER, JR.

### I. QUALIFICATIONS

1. My name is Mel Wagner Jr., and my position at Birch of the South, Inc. ("Birch") is Manager, Change Management/Control. In this role, my primary responsibilities include ILEC vendor Change Management initiatives, UNE-P/CLEC User Forum representation, OSS system release management, order flow-through monitoring and analysis. Since March 2001, my specific involvement with BellSouth has been representing Birch at each Change Control Process meeting and presenting issues for mechanized enhancements to current manual processes. I have initiated direct questioning of OSS integrity and reliability and the release management process. Additionally, I have participated in the Flow Through Task Force (Order from GA PSC Docket 7892-U) meetings to actively assist in prioritizing future flow through provisioning initiatives.

2. My background includes a Bachelor of Science degree in Business Management/Computer Information Systems from Emporia State University, Emporia Kansas. Succeeding graduation in May 1991, I immediately began my career with Southwestern Bell Communications, Inc as a manager in their Executive Leadership Development program. In that role, my assignments were diverse in nature and discipline and included tenure in corporate finance, billing system/data processing, credit/collections, and retail residential & medium business sales/provisioning. Since 2000, I have worked for Birch as a Manager of Operations and Change Management in the Carrier Relations/Regulatory division of the company. During my tenure at Birch, I have attended PUC workshops and informal dispute resolution meetings to present data related to operational issues

and system failures and participated on collaborative committees to address significant operational issues. Additionally, I have been an active participant and representative to forums such as the Southwestern Bell Change Management CLEC User Forum (chair-elect for 2002) and BellSouth Change Control Process and UNE-P Forum.

## **II. BIRCH BACKGROUND**

3. Birch was founded in 1997 in Kansas City, MO as a competitive local exchange carrier (CLEC) serving small to medium size business customers. Birch offers a gamut of services which include local, long distance, customer premise equipment, internet access and web hosting/development through local sales offices in 37 cities across Alabama, Georgia, Kansas, Missouri, North Carolina, Oklahoma, South Carolina, Tennessee and Texas. These services are provided through a combination of resold, leased, and owned network facilities. Birch reached a milestone of \*\*\*REDACTED\*\*\* access lines in June, 2001 with over \*\*\*REDACTED\*\*\* provisioned using the Unbundled Network Element Platform (UNE-P). Birch has chosen to initially use UNE-P to service customers in the BellSouth territory.

## **III. PURPOSE AND SUMMARY**

4. The purpose of this Declaration is to describe significant deficiencies in BellSouth's OSS interfaces and Change Control Processes, in addition to problems regarding the release of new versions of these interfaces. These deficiencies necessitate manual processes and result in other provisioning inefficiencies.

**IV. TAG FAILURES HAVE PREVENTED BIRCH FROM SUBMITTING ORDERS MECHANICALLY**

5. TAG is BellSouth's electronic interface to which Birch connects in order to place orders. Birch uses a provisioning interface called RoboTAG™ that directly ties into TAG. When TAG fails, Birch's ability to order mechanically is inhibited. TAG has failed Birch on many occasions. These failures, which Birch has experienced since June 2001, have resulted in either system downtime, degradation of service or loss of functionality.

6. The number of TAG failures reported in the month of June on William Stacy's affidavit greatly underestimates TAG's problems. Exhibit OSS-69. (Attachment A) The Stacy affidavit relies on a change control process outage report that found that in the month of June BellSouth had eight TAG failures resulting in 20 minutes or more of downtime, degraded service or loss of functionality. But the report only keeps track of TAG failures lasting more than 20 minutes. What the affidavit and change control process outage report fail to state is that there were *more than 30* failures, involving degraded system response time and loss of system functionality that lasted more than five minutes. (Attachment B).

7. In a Change Control meeting on June 27, Birch expressed its concern to BellSouth regarding the number of TAG and LENS system<sup>1</sup> failures and requested that BellSouth's Change Control team investigate their root cause.<sup>2</sup> Birch was directed to raise the issue with Birch's BellSouth's account team, which it did. There has been no action taken by BST.

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<sup>1</sup> The LENS system is discussed in section five of this Declaration.

<sup>2</sup> See, June 27 BellSouth Change Control minutes (Attachment C, page 10).

8. Birch was also adversely impacted by chronic TAG failures between August 2 and August 6, 2001. During the period there were a variety of failures—complete outage, loss of functionality and degraded service; it was one type of failure after another. Because of these TAG incidents, Birch provisioned less than 25% of its daily normal order volume during this time period. Birch immediately brought TAG's failures to BellSouth's attention and escalated the problem within Birch's BellSouth's account team in an effort to obtain BellSouth's commitment to fix the problem in the short and long term. (Attachment D). More than two and a half months have passed since Birch has brought the problem to BellSouth's attention and Birch has still not received a written response.

9. TAG's failures have impacted Birch significantly. Aside from the obvious impact of not being able to mechanically submit orders, Birch estimates that the examples cited above have resulted in over \*\*\*REDACTED\*\*\* hours of lost employee production time for eight FTEs costing Birch over \*\*\*REDACTED\*\*\*. In addition, due to the TAG failures, Birch recently decided to recruit an Information Technology Analyst to micro manage BellSouth's OSS systems and release management initiatives.

10. BellSouth's unreliable OSS system raises Birch's costs and results in missed due dates, customer dissatisfaction and ultimately churn. The integrity and reliability of BellSouth's systems is essential for Birch to mechanically provision orders and maintain a competitive presence in the telecommunications marketplace.

**V. BELLSOUTH DOES NOT PERFORM SUFFICIENT TESTING OF ITS LENS SYSTEM PRIOR TO RELEASE**

11. The Local Exchange Navigation System (“LENS”) is an electronic interface provided by BellSouth that allows CLECs to conduct pre-ordering and ordering activities. Birch uses LENS to retrieve pre-ordering information from BellSouth on a real-time basis.

12. On July 28, 2001, BellSouth released an updated version of LENS. Birch was notified of the July 28 update on June 28 through a carrier notification letter. (Attachment E). According to BellSouth, the purpose of the update was to improve LENS’s stability and performance. The following brief and vague comment was included in the letter:

“In addition, BellSouth upgraded the formatting and enhanced the data retrieval response time performance for the LENS Customer Service Record (CSR).” The LENS CSR response times will be greatly enhanced by changing the current Navigator© contract. The response time metrics will be more comparable in both value and definition to the metrics from the BellSouth Regional Ordering System (ROS) and Regional Negotiation System (RNS) applications.”

13. BellSouth failed to conduct sufficient testing of its new LENS system prior to release. BellSouth failed to include, present or discuss the release of the new LENS in either the March 14, 2001 or May 10, 2001 Change Control Release Management/User Requirements meetings.



14. Similarly, BellSouth did not and has not afforded Birch or any CLEC the opportunity to functionally test the LENS application in advance during the CLEC Application Verification Environment (“CAVE”) test bed window.<sup>3</sup>

15. BellSouth and CLECs were not aware of many of the problems with the newest version of LENS because of the lack of testing. These problems forced BellSouth to ask Birch to conduct its pre-ordering activities, such as finding out whether the accounts have a retail or wholesale pending service order<sup>4</sup> or local service freeze,<sup>5</sup> by manually faxing in local service requests. (Attachment F). On August 15, 2001, Birch responded by submitting the Change Request, CR0466. (Attachment G). Birch was forced to manually conduct pre-ordering activities for approximately 10% of the total monthly order volume in August and in the range of 6%-10% in the months since.

16. Subsequently, BellSouth identified the problems with LENS as OSS defects. OSS defects are defined in the BellSouth Change Control Process working document (Version 2.6 dated September 10, 2001) as “problems where the interface is not working in accordance to the BellSouth baseline user requirements

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<sup>3</sup> CAVE is a testing environment where CLECs can opt to perform further functional pre-production, ordering or post-production testing or testing to implement a new system release during a specific period.

<sup>4</sup> A Pending Service Order (“PSO”) is a retail or wholesale order that has not been completed or posted on a customer’s account. Each account with a PSO can be identified with an indicator on the CSR. A CLECs order will not be accepted until the PSO has been removed from the customer’s account.

<sup>5</sup> A Local Service Freeze (“LSF”) is a customer protection feature that prevents a customer’s local account from being switched to another local provider without written authorization. Each account with a LSF is designated with an indicator on the CSR and a CLECs order will not be accepted until the LSF has been removed from the account.

or the business rules that BellSouth has published or otherwise provided to the CLECs.”

17. On August 20, 2001, BellSouth informed Birch that the problem of not being able to use LENS to find out whether accounts have a retail or wholesale PSO would have to be resolved in a major release scheduled for January 5, 2002 because of coding complications.<sup>6</sup> BellSouth has not yet explained how or when it will address the problem of CLECs not being able to use LENS to find out whether the accounts have a LSF. Birch has appealed the extensive resolution timeframe with BellSouth’s change control office and subsequently escalated the matter to the Account Team without success. (Attachment I) Birch is extremely disappointed with the four month resolution interval to resolve a BellSouth inflicted system defect.

18. BellSouth explicitly refused to allow testing prior to release of the new LENS system. On January 18, 2001, during a CLEC Test Environment-User Requirement meeting, BellSouth was asked why its LENS system was not available for testing to the CLEC community. BellSouth responded that “LENS is a presentation layer developed by BellSouth and LENS will be reproduced in the test environment for BellSouth internal use only. (Attachment J, page 3)

19. Birch requests that all release requirements be detailed in pre-release documentation and presented in Change Control; that advance notification be provided to the user community; and that the specific changes be posted in the user guide on BellSouth’s web site. Additionally, Birch requests that BellSouth provide OSS and back-end system experts at each of the monthly Change Control meetings.

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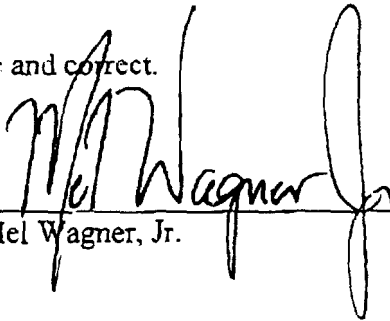
<sup>6</sup> See, CR0459. (Attachment H).

Lastly, Birch requests that the LENS application have an available test environment in CAVE or otherwise prior to release implementation.

**VI. CONCLUSION**

20. Birch's approach to Change Management/Control has always been to work collaboratively with BellSouth to resolve operational and system issues. Unfortunately, the negative impact on Birch of multiple OSS failures coupled with BellSouth's lack of responsiveness to the problem has forced Birch to resolve these problems by regulatory means.

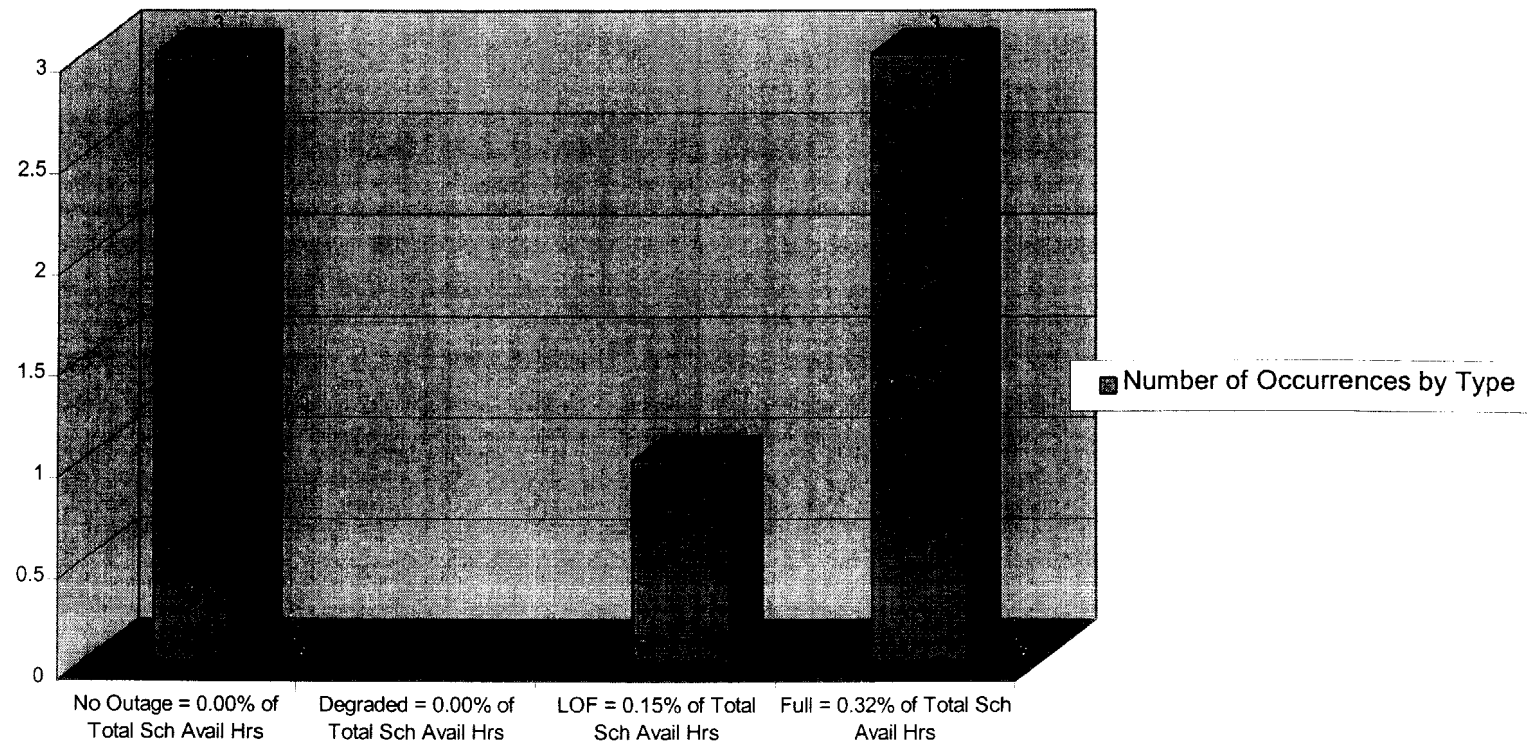
I certify that this Declaration is true and correct.

  
\_\_\_\_\_  
Mel Wagner, Jr.

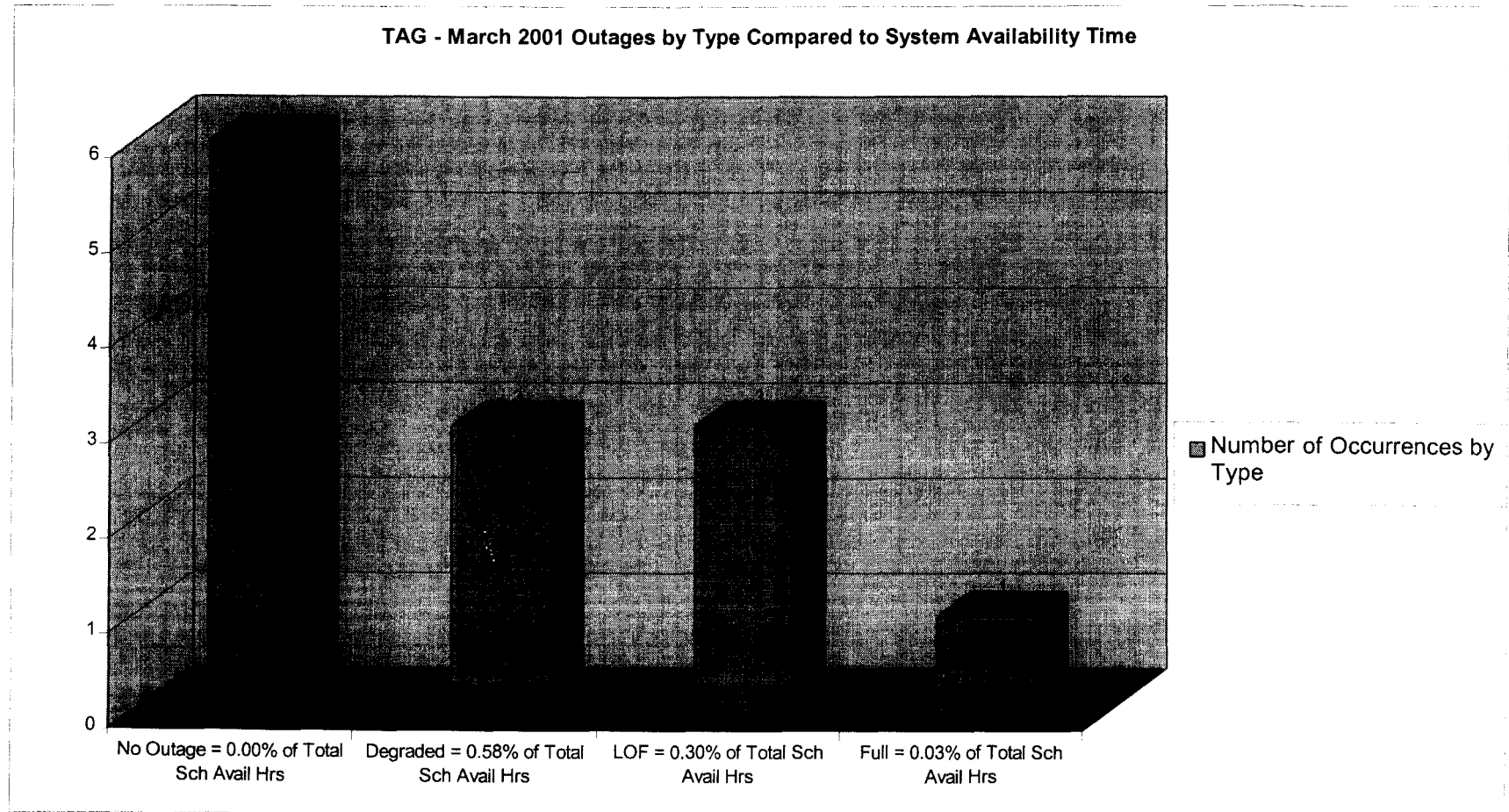
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# ATTACHMENT A

TAG - July 2001 Outages by Type Compared to System Availability Time

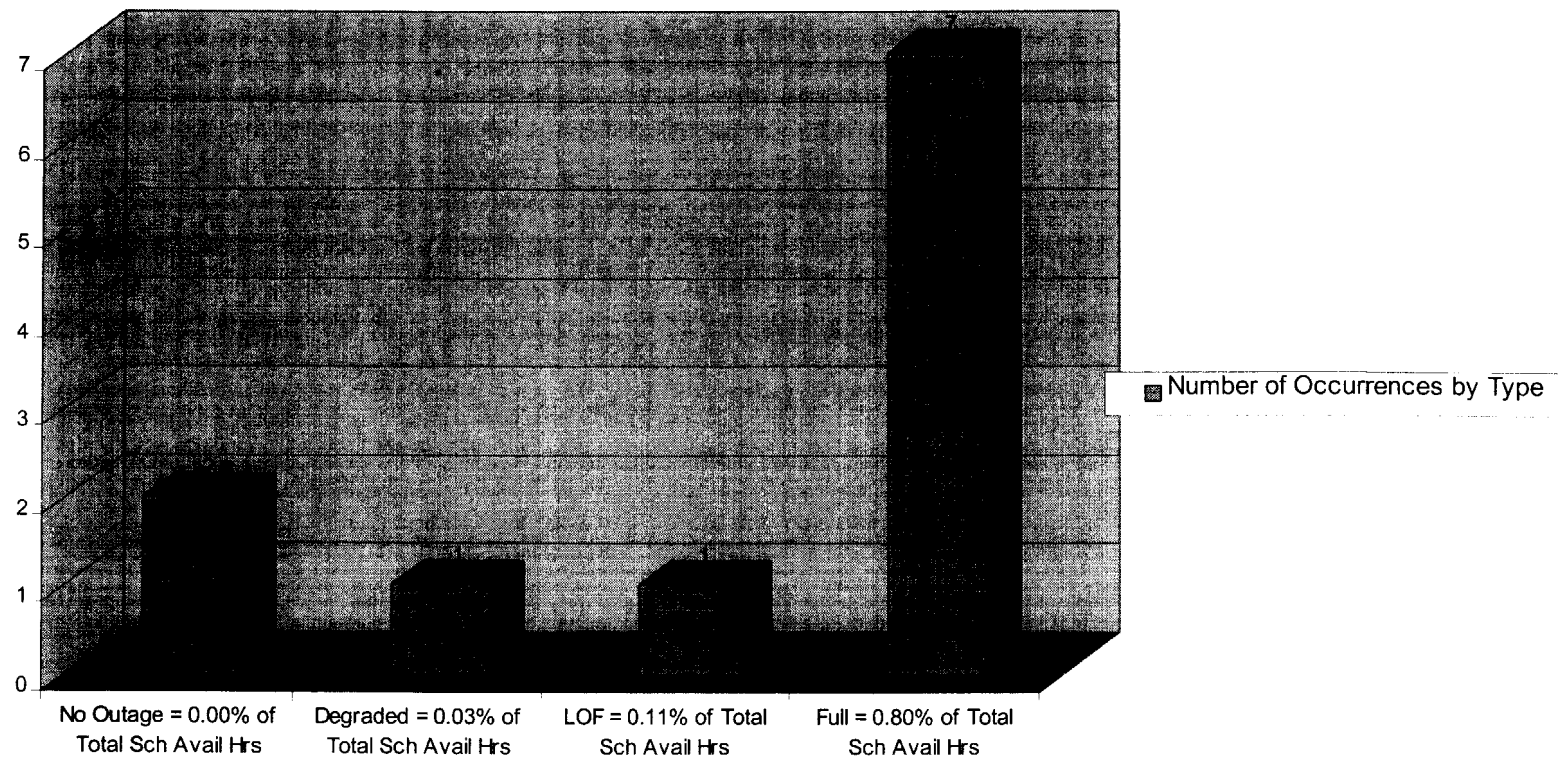


## Detailed Analysis of Change control Process (CCP) Type 1 Change Requests



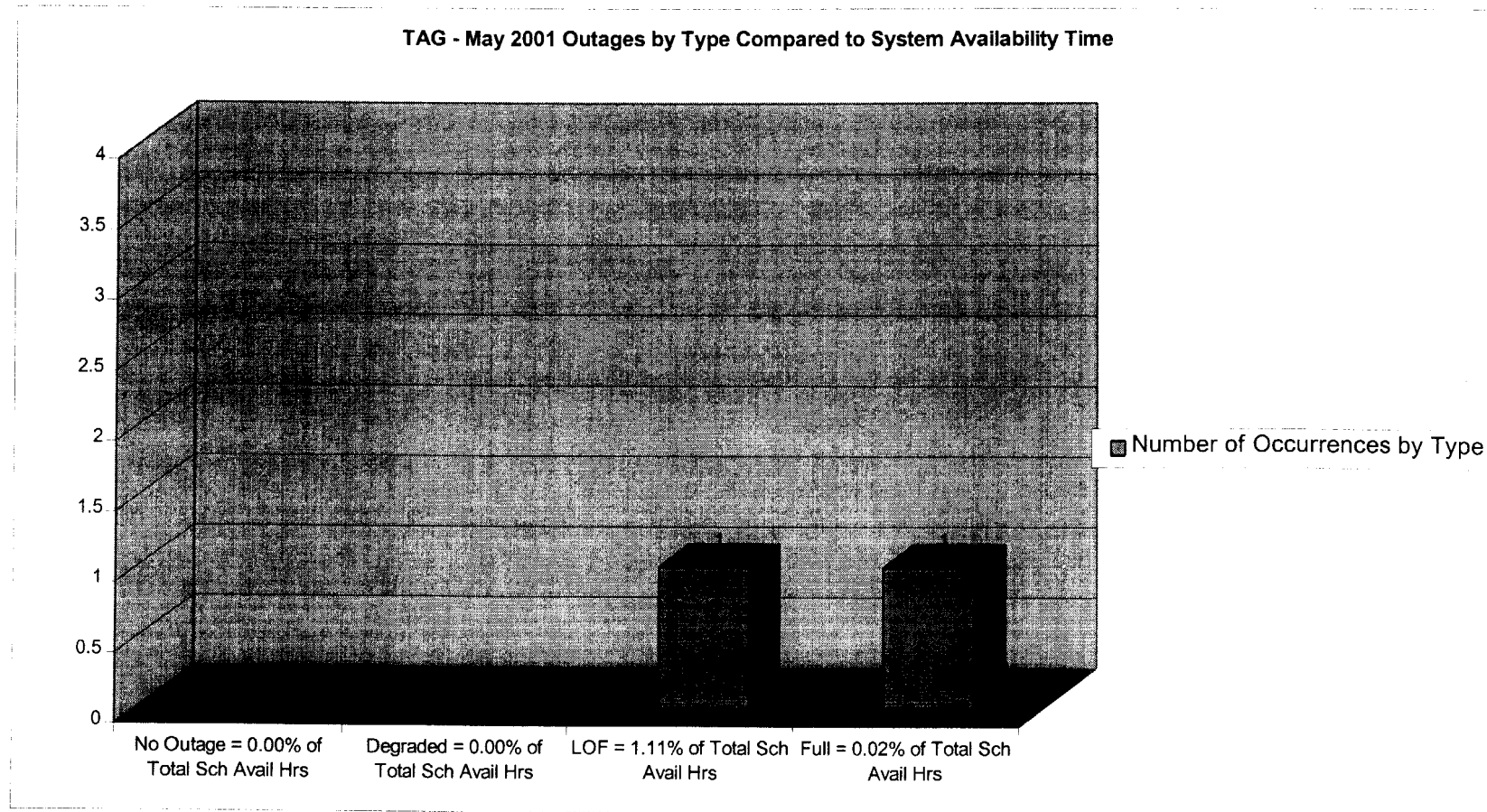
## Detailed Analysis of Change control Process (CCP) Type 1 Change Requests

TAG - April 2001 Outages by Type compared to System Availability Time





## Detailed Analysis of Change control Process (CCP) Type 1 Change Requests



## Detailed Analysis of Change control Process (CCP) Type 1 Change Requests